

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. M:07-5994-SC  
MDL No. 1917

This Document Relates to

Case No. 3:11-cv-05513-SC

*Electrograph Systems, Inc. et al. v. Hitachi, Ltd., et al., No. 11-cv-01656;*

*Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502;*

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;*

*Target Corp., et al. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;*

*Interbond Corporation of America v. Hitachi, et al., No. 11-cv-06275;*

*Office Depot, Inc. v. Hitachi, Ltd., et al., No. 11-cv-06276;*

*CompuCom Systems, Inc. v. Hitachi, Ltd. et al., No. 11-cv-06396;*

*Costco Wholesale Corporation v. Hitachi, Ltd., et al., No. 11-cv-06397;*

*P.C. Richard & Son Long Island Corporation, et al. v. Hitachi, Ltd., et al., No. 12-cv-02648;*

*Schultze Agency Services, LLC v. Hitachi, Ltd., et al., No. 12-cv-02649;*

*Tech Data Corporation, et al. v. Hitachi, Ltd., et al., No. 13-cv-00157;*

*Sharp Electronics Corp., et al. v. Hitachi, Ltd., et*

**STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING THE DEADLINE TO FILE MOTION TO COMPEL PHILIPS TO RESPOND TO DIRECT ACTION PLAINTIFFS AND INDIRECT PURCHASER PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION**

1 *al., No. 13-cv-01173;*  
 2 *Dell Inc. and Dell Products L.P. v. Hitachi, Ltd.,*  
 3 *et al., No. 13-cv-02171;*  
 4 *Sharp Electronics Corp. et al. v. Koninklijke*  
 5 *Philips Electronics, N.V., et al., No. 13-cv-*  
 6 *02776;*  
 7 *Siegel v. Technicolor SA, et al., No. 13-cv-05261;*  
 8 *Sears, Roebuck and Co., et al. v. Technicolor SA,*  
 9 *No. 13-cv-05262;*  
 10 *Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*  
 11 *No. 13-cv-05264;*  
 12 *Schultze Agency Services, LLC v. Technicolor*  
 13 *SA, et al., No. 13-cv-05668;*  
 14 *Target Corp., v. Technicolor SA, et al., No. 13-*  
 15 *cv-05686;*  
 16 *Costco Wholesale Corporation v. Technicolor*  
 17 *SA,, et al., No. 13-cv-005723;*  
 18 *Electrograph Systems, Inc., et al. v. Technicolor*  
 19 *SA, et al., No. 13-cv-05724;*  
 20 *P.C. Richard & Son Long Island Corporation, et*  
 21 *al. v. Technicolor SA, et al., No. 13-cv-05725;*  
 22 *Office Depot, Inc. v. Technicolor SA, et al., No.*  
 23 *13-cv-05726;*  
 24 *Interbond Corporation of America v. Technicolor*  
 25 *SA, et al., No. 13-cv-05727.*  
 26 *ViewSonic Corporation, v. Chunghwa Picture*  
 27 *Tubes, Ltd., et al., 3:14cv-02510;*  
 28 *The Indirect Purchaser Action.*

22 This Stipulation and Proposed Order Extending the Deadline to File Motion to Compel  
 23 Philips to Respond to Direct Action Plaintiffs and Indirect Purchaser Plaintiff's First Set of  
 24 Requests for Admission between the Direct Action Plaintiffs and Indirect Purchaser Class  
 25 (collectively "Plaintiffs"), on the one hand, and defendants Koninklijke Philips Electronics N.V.  
 26 and Philips Electronics North America Corporation (collectively, "Philips"), on the other hand, is  
 27 made with respect to the following facts and recitals:  
 28

WHEREAS, on March 21, 2014, the Court entered a scheduling order setting the close of fact discovery for September 5, 2014. *See* Dkt. No. 2459;

WHEREAS, the deadline to file any motion to compel after the discover cut-off is September 12, 2014 (L.R. 37-3);

WHEREAS, on August 1, 2014, the Plaintiffs served their First Set of Requests for Admission on Philips;

WHEREAS, on September 5, 2014, Philips served its Responses to Plaintiffs' First Set of Requests for Admission and stated objections on various grounds;

WHEREAS, on September 10, 2014, counsel for the undersigned parties held telephonic meet and confers to discuss deficiencies in Philips' responses identified by Plaintiffs and have a bona fide intent to continue doing so;

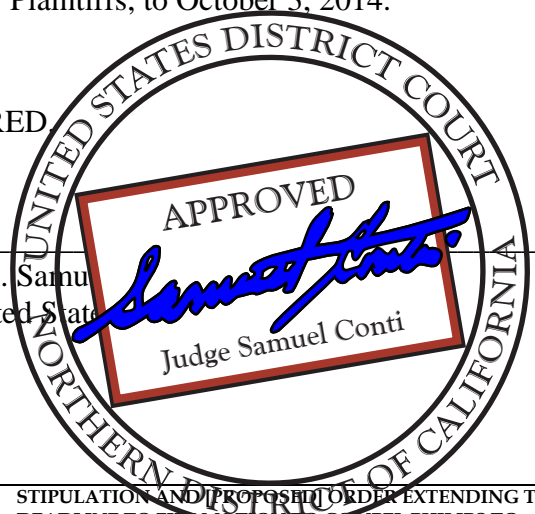
WHEREAS, the Plaintiffs and Philips have conferred by and through their counsel and, subject to the Court's approval, HEREBY STIPULATE AS FOLLOWS:

1. Subject to the parties' meet and confer discussion, the Plaintiffs provided Philips with a revised list of documents.
2. Subject to the parties' meet and confer discussion, Philips will review the revised list for inclusion on a declaration or stipulation related to their authenticity and business record status by September 26, 2014.
3. The undersigned parties agree to extend the deadline for the Plaintiffs to file a motion to compel relating to the Plaintiffs First Set of Requests for Admission, to the extent one is deemed necessary by Plaintiffs, to October 3, 2014.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 2, 2014

Hon. Samuel Conti  
United States District Court



ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

DATED: September 12, 2014

By: /s/ Laura E. Nelson  
Roman M. Silberfeld  
David Martinez  
Laura E. Nelson

*Attorneys for Plaintiffs Best Buy Co., Inc.; Best Buy  
Purchasing LLC; Best Buy Enterprise Services, Inc.;  
Best Buy Stores, L.P.; BESTBUY.COM, LLC; Magnolia  
Hi-Fi, LLC*

/s/ Lauren C. Russell  
Lauren C. Russell  
TRUMP ALIOTO TRUMP & PRESCOTT  
ATTORNEYS LLP  
2280 Union Street  
San Francisco, CA 94123  
Telephone: 415.563.7200  
Fax: 415.346.0679  
*Lead Counsel for the Indirect  
Purchaser Plaintiffs*

By: /s/ Charles Malaise  
Charles Malaise  
charles.malaise@bakerbotts.com  
BAKER BOTTS LLP  
1299 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2400  
Telephone: (202) 639-1117  
Facsimile: (202) 585-1037

*Attorneys for Defendants Koninklijke Philips  
N.V. and Philips Electronics North America  
Corporation*

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.  
ATTORNEYS AT LAW  
LOS ANGELES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28